

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
: Plaintiff,
: v. : MOTION TO ADMIT PAUL
: BRYANSTON GROUP INC. et al., : MOGIN PRO HAC VICE
: Defendants.
: X

Pursuant to Local Civil Rule 1.3(c), undersigned counsel respectfully moves for the admission *pro hac vice* of the following attorney in the above-captioned matter:

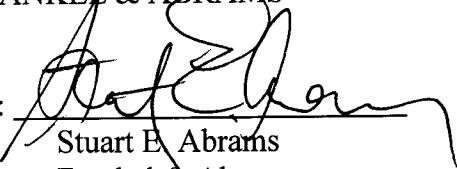
Paul Mogin
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Tel: (202) 434-5000
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Mr. Mogin is a member in good standing of the Bar of the District of Columbia. There are no pending disciplinary proceedings against Mr. Mogin in any State or Federal Court. This Motion is based on the accompanying Affidavit of Stuart E. Abrams and a Certificate of Good Standing from the District of Columbia Bar. A proposed Order is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By:


Stuart E. Abrams
Frankel & Abrams
230 Park Avenue, Suite 660
New York, New York 10169-0005
(212)661-5000

Counsel for Claimant Beatrice Tollman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
: Plaintiff, :
v. : DECLARATION OF STUART E.
BRYANSTON GROUP INC. et al., : ABRAMS IN SUPPORT OF
: MOTION TO ADMIT PAUL
: MOGIN PRO HAC VICE
: Defendants. :
: X

I, STUART E. ABRAMS, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby declare the following to be true under the penalties of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner at Frankel & Abrams and counsel for claimant Beatrice Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth here and in support of the motion to admit Paul Mogin as counsel pro hac vice to represent Ms. Tollman in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1978. I am also a member in good standing of the bar of this Court, admitted in 1978.
3. I have known Mr. Mogin since earlier this year.
4. Mr. Mogin is a partner at Williams & Connolly, in Washington, DC.

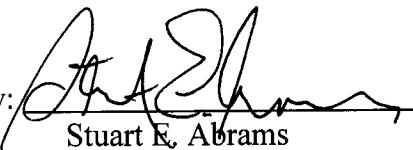
5. I have found Mr. Megin to be a skilled attorney and person of the highest integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Mr. Megin is a member in good standing of the bar of the District of Columbia. In connection with this motion, I am submitting a Certificate of Good Standing issued by this bar. I am aware of no pending disciplinary proceedings against Mr. Megin in any state or federal court.

7. For the foregoing reasons, I respectfully move the *pro hac vice* admission of Paul Megin in the above-captioned matter. For the Court's convenience, a proposed order granting this motion is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams
Frankel & Abrams
230 Park Avenue, Suite 660
New York, New York 10169-0005
(212)661-5000
Counsel for Claimant Beatrice Tollman



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL MOGIN

was on the 18TH day of DECEMBER, 1981

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: N. Charles
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA, : Case No.: 1:08-cv-04806 (LAP)
: Plaintiff, :
v. : [PROPOSED] ORDER FOR
: ADMISSION OF PAUL MOGIN
: PRO HAC VICE
BRYANSTON GROUP INC. et al., :
: Defendants. :
: X

This matter having been brought before the Court by motion pursuant to Local Civil Rule 1.3(c) for the admission *pro hac vice* of Paul Mogin, Esq., in the above-captioned matter, it is this _____ day of _____ 2008, hereby
ORDERED that the motion is GRANTED, and
IT IS FURTHER ORDERED THAT Paul Mogin shall be admitted *pro hac vice* in the above-captioned matter. Counsel shall remit the required \$25 fee to the Cashier's Office for this *pro hac vice* admission.

Dated:

HON. LORETTA A. PRESKA, U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
UNITED STATES OF AMERICA,
Plaintiff,

v.

BRYANSTON GROUP INC., et al.,
Defendants.

-----x
CERTIFICATE OF SERVICE

STUART E. ABRAMS, hereby certifies that on July 28, 2008, I caused to be served by First Class Mail a true and correct copy of the attached Motion for Admission Pro Hac Vice and supporting papers upon

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Dated: July 28, 2008

By 
Stuart E. Abrams
Counsel for Stanley Tollman